

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	Criminal No. 04-_____
v.	:	Date Filed: July 22, 2004
GERALD D. ROBINSON	:	Violations:
	:	18 U.S.C. § 1028(a)(7) and (f) (attempt to transfer a means of identification of another person to commit a felony under federal law - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about April 29, 2003, in Philadelphia, in the Eastern District of Pennsylvania, defendant

GERALD ROBINSON

knowingly and without lawful authority attempted to transfer a means of identification of another person, that is the names, addresses, dates of birth, social security numbers, and other personal information of approximately 1500 people which was recorded in confidential forms, with the intent to commit, and to aid and abet, a violation of federal law, that is unauthorized use of social security numbers, in violation of Title 42, United States Code, Section 408(a)(7), and thereby affected interstate commerce.

In violation of Title 18, United States Code, Sections 1028(a)(7), (b)(2)(b), (c)(3)(A), and (f).

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offense charged in Count One of this Indictment, defendant GERALD D. ROBINSON:

a. Committed an offense in which there was a risk of substantial non-monetary harm for 1500 victims, as referenced in U.S.S.G. §2B1.1, Comment (n. 18(A)(ii)).

_____**A TRUE BILL:**

_____**GRAND JURY FOREPERSON**

PATRICK L. MEEHAN
UNITED STATES ATTORNEY_____